

FILED

SEP 21 2021

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

SOLOMON WILLIAMS,
JAMES ANDREW LOGAN
DAVID SHANE WORRELL,
KYLE LEE HARDER,
KRISTIN LEANNE PRICE,
SHANE TOBIAS, and
LACI TAYLOR,

Defendants.

Criminal No.

3:21-CR-

45

Violations:

18 U.S.C. § 371
18 U.S.C. § 922(a)(3)
18 U.S.C. § 922 (g)(1)
18 U.S.C. § 922 (g)(3)
18 U.S.C. § 922(a)(6)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 846
18 U.S.C. § 924(a)(1)(D)
18 U.S.C. § 924(a)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy)

1. From on or about June 1, 2020 to the present, in Berkeley County in the Northern District of West Virginia and elsewhere, the defendants **SOLOMON WILLIAMS, JAMES ANDREW LOGAN, DAVID SHANE WORRELL, KRISTIN LEANNE PRICE, SHANE TOBIAS, and LACI TAYLOR** unlawfully, knowingly and willfully did combine, conspire, confederate and agree together and with others to commit an offense against the United States, to

wit, to purchase, possess, and transfer firearms, to transfer handguns to an out of state resident, and to transfer firearms to a prohibited person, all in violation of the Gun Control Act, Title 18 United States Code, Sections 922(a), 922(g), and 924(a).

MANNER & MEANS

2. It was a part of the conspiracy that defendant **KRISTIN LEANNE PRICE** would purchase firearms from Federal Firearms Licensees (“FFLs”) in Berkeley County, West Virginia.

3. Defendants **DAVID SHANE WORRELL** and **LACI TAYLOR** would request **KRISTIN LEANNE PRICE** and **SHANE TOBIAS** to assist them in acquiring firearms.

4. Defendant **KRISTIN LEANNE PRICE** would purchase firearms and complete the ATF Form 4473 averring that she resided at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance,.

5. After defendant **KRISTIN LEANNE PRICE** purchased and acquired the firearms, defendants **KRISTIN LEANNE PRICE** and **SHANE TOBIAS** would transfer the firearms to defendants **DAVID SHANE WORRELL** and **LACI TAYLOR**.

6. Defendants **DAVID SHANE WORRELL** and **LACI TAYLOR** arranged the sale of the purchased firearms to **SOLOMON WILLIAMS** and **JAMES ANDREW LOGAN**, out-of-state residents.

7. Defendants **KRISTIN LEANNE PRICE** and **SHANE TOBIAS** received financial payment from **DAVID SHANE WORRELL** for purchasing the firearms.

8. Defendants **KRISTIN LEANNE PRICE** and **SHANE TOBIAS** would use the money to purchase controlled substances, including controlled substances from Kyle Lee Harder.

OVERT ACTS

9. In furtherance of the conspiracy and to effect the objects of the conspiracy the following overt acts, among others, were committed in the Northern District of West Virginia and elsewhere:

- a. On or about June 19, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of a firearm, a Masterpiece Arms Mini, 9mm pistol, bearing serial number F22907 knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance;
- b. On or about June 19, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **DAVID SHANE WORRELL**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is the felony offense of Possession of Controlled Substance in the Circuit Court of Rockingham County, Virginia case number CR15000933-00, did knowingly possess

- a firearm, that is a Masterpiece Arms Mini, 9mm pistol, bearing serial number F22907, said firearm having been shipped and transported in interstate commerce;
- c. On or about June 19, 2020, defendant **JAMES ANDREW LOGAN** sent \$115 via Cash App to defendant **SHANE TOBIAS**'s Cash App account for partial payment of the Masterpiece Arms Mini, 9mm pistol;
- d. On or about June 21, 2020, defendant **SOLOMON WILLIAMS** possessed the Masterpiece Arms Mini, 9mm pistol and a turquoise and silver Ruger pistol. The firearms were acquired from defendants **KRISTIN LEANNE PRICE** and **DAVID SHANE WORRELL**;
- e. On or about October 3, 2020, defendants **SHANE TOBIAS** and **LACI TAYLOR** requested defendant **KRISTIN LEANNE PRICE** to purchase firearms for them;
- f. On or about October 3, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a Taurus model TH9C, 9mm caliber pistol, bearing serial number ABG693114 and a Ruger model EC9S, 9mm caliber pistol, bearing serial number 457-92778, knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg,

West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance;

- g. On or about October 3, 2020, following defendant **KRISTIN LEANNE PRICE**'s purchase of the firearms, defendant **LACI TAYLOR** informed defendant **SOLOMON WILLIAMS** that the firearms were being purchased and defendant **SOLOMON WILLIAMS** indicated he was in Berkeley Springs, West Virginia;
- h. On or about October 10, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a S&W model SD9VE, 9mm pistol bearing serial number FCN5603, a Taurus, model 605, .357 revolver, bearing serial number ABJ907816, and a HS Produkt, model XD9, 9mm pistol, bearing serial number BY311682, knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance;
- i. On or about October 16, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition

of firearms, a S&W model M&P 40C, .40 caliber pistol, bearing serial number HAT4446, and a S&W M&P9 model, 9mm pistol, bearing serial number JFC4487, knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance;

- j. On or about October 31, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a Taurus model G3C, 9mm pistol, bearing serial number ABK058476; a S&W model SD40VE, .40 caliber pistol, bearing serial number FCN5388, and a Taurus model G2C, 9mm pistol, bearing serial number ALB113772, knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact,

she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance;

- k. On or about November 8, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a HS Produkt model XDS, 9mm pistol, bearing serial number BY311635, a HS Produkt model XDS, 9mm pistol, bearing serial number BY325104, and a Glock GMBH model 29, .10 caliber pistol, bearing serial number BPUP734, knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; and

- l. other overt acts.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(False Statements During Purchase of Firearm)

On or about June 19, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of a firearm, a Masterpiece Arms Mini, 9mm pistol, bearing serial number F22907, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

(Unlawful Possession of Firearm)

On or about June 19, 2020, in Berkeley County, in the Northern District of West Virginia, defendant **DAVID SHANE WORRELL**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, that is the felony offense of Possession of Controlled Substance in the Circuit Court of Rockingham County, Virginia case number CR15000933-00, did knowingly possess a firearm, that is a Masterpiece Arms Mini, 9mm pistol, bearing serial number F22907, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FOUR

(False Statements During Purchase of Firearms)

On or about October 3, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a Taurus model TH9C, 9mm caliber pistol, bearing serial number ABG693114 and a Ruger model EC9S, 9mm caliber pistol, bearing serial number 457-92778, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE

(False Statements During Purchase of Firearms)

On or about October 10, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a S&W model SD9VE, 9mm pistol bearing serial number FCN5603, a Taurus, model 605, .357 revolver, bearing serial number ABJ907816, and a HS Produkt, model XD9, 9mm pistol, bearing serial number BY311682, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SIX

(False Statements During Purchase of Firearms)

On or about October 16, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a S&W model M&P 40C, .40 caliber pistol, bearing serial number HAT4446, and a S&W M&P9 model, 9mm pistol, bearing serial number JFC4487, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT SEVEN

(False Statements During Purchase of Firearms)

On or about October 31, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a Taurus model G3C, 9mm pistol, bearing serial number ABK058476; a S&W model SD40VE, .40 caliber pistol, bearing serial number FCN5388, and a Taurus model G2C, 9mm pistol, bearing serial number ALB113772, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT EIGHT

(False Statements During Purchase of Firearms)

On or about November 8, 2020, in Morgan County, in the Northern District of West Virginia, defendant **KRISTIN LEANNE PRICE**, in connection with the acquisition of firearms, a HS Produkt model XDS, 9mm pistol, bearing serial number BY311635, a HS Produkt model XDS, 9mm pistol, bearing serial number BY325104, and a Glock GMBH model 29, .10 caliber pistol, bearing serial number BPUP734, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code (referred to as a FFL), knowingly made false and fictitious written statements to a FFL, which statements were intended and likely to deceive a FFL, as to a fact material to the lawfulness of such sale of the said firearm to defendant **KRISTIN LEANNE PRICE** under chapter 44 of Title 18, in that the defendant represented herself to reside at 761 Mount Olive Road, Martinsburg, West Virginia, that she was the actual purchaser of the firearm, and that she was not an unlawful user of, or addicted to, a controlled substance, when in fact, she did not reside at 761 Mount Olive Road, Martinsburg, West Virginia, she was not the true purchaser of the firearm, and she was an unlawful user of, or addicted to, a controlled substance; in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT NINE

(Unlawful Possession of Firearm)

On or about April 14, 2021, in Jefferson County, in the Northern District of West Virginia, defendant **KYLE LEE HARDER**, knowing that he was an unlawful user of a controlled substance and did knowingly possess a firearm, that is a SCCY, Model CPX-1, 9mm pistol, bearing serial number C117908, said firearm having been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

COUNT TEN

(Conspiracy to Possess with Intent to Distribute and to Distribute Fentanyl and Eutylone)

From on or about January 1, 2021 to April 30, 2021 in Berkeley and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendants **KYLE LEE HARDER**, **SHANE TOBIAS**, and **KRISTIN LEANNE PRICE** did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding together with each other and others to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute, and to distribute fentanyl, a Schedule II controlled substance, and 1-(1,3-Benzodioxol-5-yl)-2-(ethylamino)butan-1-one, also known as Eutylone, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 846, and 841(b)(1)(C).

COUNT ELEVEN

(Possession with Intent to Distribute Fentanyl)

On or about March 9, 2021, in Berkeley County, West Virginia, in the Northern District of West Virginia, defendants **SHANE TOBIAS** and **KRISTIN LEANNE PRICE**, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

(Possession with Intent to Distribute Eutylone)

On or about March 9, 2021, in Berkeley County, West Virginia, in the Northern District of West Virginia, defendants **SHANE TOBIAS** and **KRISTIN LEANNE PRICE**, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute 1-(1,3-Benzodioxol-5-yl)-2-(ethylamino)butan-1-one, also known as Eutylone, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

(Possession with Intent to Distribute Fentanyl)

On or about March 11, 2021, in Jefferson County, West Virginia, in the Northern District of West Virginia, defendant **KYLE LEE HARDER**, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

(Possession with Intent to Distribute Eutylone)

On or about March 11, 2021, in Jefferson County, West Virginia, in the Northern District of West Virginia, defendant **KYLE LEE HARDER**, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute 1-(1,3-Benzodioxol-5-yl)-2-(ethylamino)butan-1-one, also known as Eutylone, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

(Possession with Intent to Distribute Fentanyl)

On or about March 24, 2021, in Berkeley County, West Virginia, in the Northern District of West Virginia, defendants **SHANE TOBIAS** and **KRISTIN LEANNE PRICE**, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Possession with Intent to Distribute Eutylone)

On or about March 24, 2021, in Berkeley County, West Virginia, in the Northern District of West Virginia, defendants **SHANE TOBIAS** and **KRISTIN LEANNE PRICE**, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute 1-(1,3-Benzodioxol-5-yl)-2-(ethylamino)butan-1-one, also known as Eutylone, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

(Controlled Substances Act)

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including, but not limited to a Masterpiece Arms Mini, 9mm pistol, bearing serial number F22907; a Taurus model TH9C, 9mm caliber pistol, bearing serial number ABG693114; a Ruger model EC9S, 9mm caliber pistol, bearing serial number 457-92778; a S&W model SD9VE, 9mm pistol bearing serial number FCN5603; a Taurus, model 605, .357 revolver, bearing serial number ABJ907816; a HS Produkt, model XD9, 9mm pistol, bearing serial number BY311682, a S&W model M&P 40C, .40 caliber pistol, bearing serial number HAT4446; a S&W M&P9 model, 9mm pistol, bearing serial number JFC4487; a Taurus model G3C, 9mm pistol, bearing serial number ABK058476; a S&W model SD40VE, .40 caliber pistol, bearing serial number FCN5388; a Taurus model G2C, 9mm pistol, bearing serial number ALB113772; a HS Produkt model XDS, 9mm pistol, bearing serial number BY311635; a HS Produkt model XDS, 9mm pistol, bearing serial number BY3251041; a Glock GMBH model 29, .10 caliber pistol, bearing serial number BPUP734, and a SCCY, Model CPX-1, 9mm pistol, bearing serial number C117908.

(Gun Control Act)

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition

involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2), including a Masterpiece Arms Mini, 9mm pistol, bearing serial number F22907; a Taurus model TH9C, 9mm caliber pistol, bearing serial number ABG693114; a Ruger model EC9S, 9mm caliber pistol, bearing serial number 457-92778; a S&W model SD9VE, 9mm pistol bearing serial number FCN5603; a Taurus, model 605, 357 revolver, bearing serial number ABJ907816; a HS Produkt, model XD9, 9mm pistol, bearing serial number BY311682, a S&W model M&P 40C, .40 caliber pistol, bearing serial number HAT4446; a S&W M&P9 model, 9mm pistol, bearing serial number JFC4487; a Taurus model G3C, 9mm pistol, bearing serial number ABK058476; a S&W model SD40VE, .40 caliber pistol, bearing serial number FCN5388; a Taurus model G2C, 9mm pistol, bearing serial number ALB113772; a HS Produkt model XDS, 9mm pistol, bearing serial number BY311635; a HS Produkt model XDS, 9mm pistol, bearing serial number BY325104; a Glock GMBH model 29, .10 caliber pistol, bearing serial number BPUP734, and a SCCY, Model CPX-1, 9mm pistol, bearing serial number C117908.

A True Bill,

/s/
Grand Jury Foreperson

/s/
RANDOLPH J. BERNARD
Acting United States Attorney

Lara K. Omps-Botteicher
Assistant United States Attorney